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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

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10 FEDERAL TRADE COMMISSION,

11 Plaintiff,

12 v.

13 CRYSTAL EWING, individually and as a director
14 or officer of Classic Productions, LLC;

15 CLASSIC PRODUCTIONS, LLC, a Nevada
16 limited liability corporation;

17 GLOBAL ACCESS MANAGEMENT
18 SYSTEMS, INC., a Nevada company, also d/b/a
Citra-Slim 4;

19 RICKI BLACK, individually and as an officer or
20 director of Global Access Management Systems,
Inc.;

21 HEALTH NUTRITION PRODUCTS, LLC, a
22 Delaware limited liability company, also d/b/a
HN P LLC, d/b/a W8-B-Gone, and d/b/a Quick &
Easy;

23 HOWARD RAFF, a/k/a HOWARD BRUCE,
24 individually and as an officer or director of Health

Case No. 2:14-cv-000683-RFB-VCF

JOINT STIPULATION BETWEEN
THE FTC AND CRYSTAL EWING
AND CLASSIC PRODUCTIONS,
LLC [AND PROPOSED ORDER]
MODIFYING THE CASE
MANAGEMENT ORDER
SOLELY AS TO CRYSTAL
EWING

1 Nutrition Products, LLC;

2 DAVID RAFF, individually and as a *de facto*
3 officer or director of Health Nutrition Products,
4 LLC;

5 OMNI PROCESSING CENTER, a Nevada
6 company;

7 MBE MANAGEMENT LLC, a Nevada limited
liability company;

8 SHIRLEY MURPHY, individually and as a
9 director or officer of Omni Processing Center;

10 and

11 RONALD BOYDE, individually and as a director
12 or officer of Omni Processing Center and a *de*
facto director or officer of MBE Management
13 LLC,

14 Defendants.

15 Plaintiff Federal Trade Commission (“FTC”) and Defendants Crystal Ewing and Classic
16 Productions, LLC (collectively “The Parties”) hereby agree and stipulate as follows:

- 18 1. The Parties are presently engaged in settlement negotiations.
- 19 2. All settlements must be approved by the full Commission.
- 20 3. The close of discovery is June 1, 2015. *See* ECF #56.
- 21 4. The Parties agree that the discovery period shall remain open for an additional 28
22 days solely to preserve the FTC’s right to depose Ms. Ewing in the event that The Parties are
23 unable to reach a settlement agreement.

5. This Joint Stipulation is made without prejudice to any party's ability to apply to the Court for any further or additional relief.

Dated: May 29, 2015

Respectfully submitted,

/s/ Alejandro G. Rosenberg

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Attorney for Defendants Crystal Ewing and Classic
Productions, LLC

ORDER

IT IS SO ORDERED.

5/29/2015

Carl Gaddis

~~U.S. District Court Judge / U.S. Magistrate Judge~~

1 **CERTIFICATE OF SERVICE**

2 I, Alejandro G. Rosenberg, hereby certify that on the 29th day of May, 2015, I served the
3 foregoing document electronically on all counsel above via CM/ECF, and on Ricki Black via
4 email to ricki.black@ymail.com.

5 */s/ Alejandro G. Rosenberg*

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7 Alejandro G. Rosenberg

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